

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat  
Brown

**DECLARATION OF CHRISTOPHER A. O'HARA REGARDING CLASS NOTICE**

I, Christopher A. O'Hara, declare as follows:

1. I am a member in good standing of the State Bars of Washington and Arizona. I am a partner at Hagens Berman Sobol Shapiro LLP ("Hagens Berman"), Lead Counsel in the above captioned case. I make this declaration of my own personal knowledge, except where noted, and, if called upon to do so, could and would testify competently to the facts that it contains.

2. For the past several years, my main role at Hagens Berman has been to work on all our class action settlements on all aspects of claims administration, and more specifically, to work with third-party settlement notice providers in designing and implementing class notice programs.

3. I provide this declaration to inform the Court of actions and progress related to the settlement and the provision of class notice in the case of *Keller v. Electronic Arts, Inc. et al.*, Case No. 4:09-cv-01967-CW (N.D. Cal.) ("NCAA Likeness Settlement"), which may be relevant to the parties' proposal regarding class notice in the instant matter, and to the Court's consideration thereof.

4. The NCAA Likeness Settlement classes broadly include certain NCAA football and basketball players listed on rosters published or issued by a school whose team was included in NCAA-Branded Videogames. The Likeness classes include former student-athletes going back as far as 2003. The Court-approved notice and claims administrator in the NCAA Likeness Settlement is Gilardi & Co. ("Gilardi"), the same proposed notice and claims administrator in the instant case. Following the Court's preliminary approval of the NCAA Likeness Settlement in 2014, I have been involved in working with Gilardi and the NCAA's counsel over the past several months to obtain direct contact information for the Likeness class members in order for Gilardi to provide direct notice of the Likeness Settlement to those class members. The efforts to obtain direct contact information in the Likeness Settlement are similar to what the parties are proposing to do here in the instant case. While these efforts are still in progress, they have been largely successful in obtaining class member contact information and may partially inform the Court as to what can be done in the same regard here.

5. The process began in earnest on November 12, 2014 with the NCAA sending its member schools emails and letters requesting and instructing them to attempt to compile and submit to Gilardi data including all last known contact information for the schools' current and former football and men's basketball players going back to 2003. The schools were asked and directed to download their data to a Gilardi-designed and maintained secured website, similar to what the parties propose to do here. The first responding download of contact information from a school happened just days later, on November 17, 2014.

6. Following a reminder email from the NCAA to the schools in early December, 2015, the response rate picked up substantially and the schools have been individually and successfully downloading their data to Gilardi's website ever since. As the parties have also

seen here, several member institutions expressed concerns that they would require a subpoena before providing contact information, to ensure compliance with, *inter alia*, the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, so subpoenas were sent to these schools asking for that information and that process is ongoing, as the schools respond to the subpoenas. *See Stipulation and Order Concerning Extension of Deadlines in Orders Granting Preliminary Approval of Class Action Settlements in the Likeness Settlement*, dated December 29, 2014, at p. 1-3 (“Likeness Order”), attached hereto as Exhibit 1.

7. As of December 26, 2014, 156 member institutions had provided Gilardi ascertainable information regarding the names and last-known addresses of NCAA football and basketball players who were listed on a roster published or issued by a school whose team was included in an NCAA-Branded Videogame originally published or distributed going back to 2003. At that time, Gilardi sampled the information uploaded by NCAA member institutions and analyzed the quality of the addresses. Gilardi’s analysis found that approximately 97% of the addresses were valid addresses, and were therefore likely to be effective in disseminating information to Settlement class members in the NCAA Likeness Settlement. *See Exhibit 1, Likeness Order at p. 2.*

8. As of February 18, 2015, Gilardi has now received downloads of contact information from a total of 284 NCAA schools, out of approximately 330 member institutions, which were sent requests and/or subpoenas. Based on the contact information obtained to date and that expected to come in over the next few weeks, Gilardi is preparing to mail direct notice to class members in the Likeness Settlement beginning in early March, 2015.

9. Based on the contact information received to date and that expected to come in in the coming weeks, I understand that Gilardi expects to receive data that would allow it to mail a notice regarding the Likeness Settlement to approximately 60% of the Likeness class members. Gilardi has also prepared an indirect notice plan to supplement the direct notice efforts in the

Likeness Settlement, including nationwide publication on the internet through directed advertising to likely class members, and print publication in *ESPN the Magazine* and *Sports Illustrated* magazine, similar to what the parties propose to do here in the Concussions settlement in order to supplement the direct notice to be mailed to Class members. Gilardi estimates that the combined reach of the direct and indirect notice efforts in the Likeness Settlement will exceed 80%.

10. With regard to direct notice, the parties propose to engage in a similar process here in the Concussion case, with the parties sending out requests (and subpoenas where necessary) to the member institutions to submit their last known direct contact information for Class members to a secure website to be developed and maintained by Gilardi. *See* Declaration of Alan Vasquez Regarding Direct Notice at ¶¶5-6.

11. Attached as Exhibit 2 hereto is a chart prepared by Gilardi listing each school that has downloaded their data to the Likeness Settlement website and the date of the download, as of February 23, 2015.

12. Attached as Exhibit 3 hereto is a graph prepared by Gilardi showing the rate of downloads by the schools in the Likeness Settlement through February 23, 2015.

13. While the Likeness class is smaller than the Concussions Class proposed here (encompassing only two sports and going back only to 2003), the process in place for obtaining last known direct contact information for current and former student-athletes has been largely successful in the Likeness Settlement and may inform similar efforts that the parties propose to prepare for the dissemination of direct notice to the proposed Concussion Class here.

I declare that the foregoing is true and correct to the best of my ability.

Date: February 23, 2015

Respectfully submitted,

By: 

Christopher A. O'Hara

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on February 23, 2015, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Steve W. Berman

# **EXHIBIT - 1**

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Right of Publicity Plaintiffs' Class Counsel Attorneys for Defendant Electronic Arts Inc.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

EDWARD C. O'BANNON, JR., on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION (NCAA); ELECTRONIC  
ARTS, INC.; and COLLEGIATE  
LICENSING COMPANY,

Defendants.

SAMUEL MICHAEL KELLER, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION (NCAA); ELECTRONIC  
ARTS, INC.; and COLLEGIATE  
LICENSING COMPANY,

Defendants.

Case Nos. 09-cv-3329-CW, 09-cv-1967 CW

**STIPULATION AND ORDER  
CONCERNING EXTENSION OF  
DEADLINES IN ORDERS GRANTING  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENTS**

Judge: Hon. Claudia Wilken  
Crtrm: 2, 4th Floor



1 WHEREAS, on September 3, 2014, the Court granted preliminary approval to two  
2 settlements—one between the Antitrust Plaintiffs and the Right of Publicity Plaintiffs and  
3 Electronic Arts Inc. (Case No. 09-1967-CW, Dkt. No. 1177); and one between the Right of  
4 Publicity Plaintiffs and the National Collegiate Athletic Association (Case No. 09-1967-CW, Dkt.  
5 No. 1178);

6 WHEREAS, the Court also approved both Class Notice plans, providing further that

7 As part of that Class Notice plan, the NCAA will request that its member  
8 institutions and affiliated alumni associations provide to the Notice and Claims  
9 Administrator reasonably ascertainable information regarding the names and last-  
10 known addresses of NCAA football and basketball players who were listed on a  
11 roster published or issued by a school whose team was included in an NCAA-  
12 Branded Videogame originally published or distributed during the *Keller* Right of  
13 Publicity Settlement Class Period. To the extent that a member institution or  
14 affiliated alumni association declines to provide such information, Class Counsel  
15 shall endeavor in good faith to obtain such information, including when necessary  
16 by subpoena to such member institution or affiliated alumni association (to the  
17 extent Class Counsel have not already done so), and shall forward any information  
18 received to the Notice and Claims Administrator.

19 Case No. 09-1967-CW, Dkt. No. 1178, at 4.

20 As part of that Class Notice plan, in coordination with the NCAA Videogame  
21 Settlement, the NCAA will request that its member institutions and affiliated  
22 alumni associations provide to the Notice and Claims Administrator reasonably  
23 ascertainable information regarding the names and last-known addresses of NCAA  
24 football and basketball players who were listed on a roster published or issued by a  
25 school whose team was included in an NCAA-Branded Videogame originally  
26 published or distributed during the Settlement Class Period. To the extent that a  
27 member institution or affiliated alumni association declines to provide such  
28 information, Class Counsel shall endeavor in good faith to obtain such information,  
including by subpoenaing if necessary such member institution and affiliated  
alumni association for that information (to the extent it has not already done so),  
and shall forward any information received to the Notice and Claims  
Administrator.

Case No. 09-1967-CW, Dkt. No. 1177, at 5-6;

WHEREAS, in the intervening months the NCAA has requested on multiple occasions that  
its member institutions and affiliated alumni associations provide to the Notice and Claims  
Administrator reasonably ascertainable information regarding the names and last-known addresses  
of NCAA football and basketball players who were listed on a roster published or issued by a

1 school whose team was included in an NCAA-Branded Videogame originally published or  
2 distributed during the respective class periods;

3 WHEREAS, responsive to the NCAA's requests, 156 member institutions have now  
4 provided to the Notice and Claims Administrator reasonably ascertainable information regarding  
5 the names and last-known addresses of NCAA football and basketball players who were listed on  
6 a roster published or issued by a school whose team was included in an NCAA-Branded  
7 Videogame originally published or distributed during the respective class periods;

8 WHEREAS, the Notice and Claims Administrator, Gilardi & Co. LLC, has sampled the  
9 information uploaded by NCAA member institutions and analyzed the quality of the addresses.  
10 Gilardi's analysis found that approximately 97 % of the addresses were valid addresses, and are  
11 therefore likely to be effective in disseminating information to Settlement Class Members;

12 WHEREAS, the NCAA has been in active communication with its member institutions,  
13 some of whom have informed the NCAA that they will need additional time to respond to the  
14 request;

15 WHEREAS, some of the NCAA's member institutions have informed the NCAA that they  
16 believe that their student-athlete contact information is protected under the Family Educational  
17 Rights and Privacy Act ("FERPA") and that they will provide the requested information once they  
18 have received a subpoena for the information and the other procedural requirements of FERPA  
19 have been satisfied;

20 WHEREAS, no member institution to date has refused outright to disclose the requested  
21 information;

22 WHEREAS, the Antitrust Plaintiffs and Right of Publicity Plaintiffs are in the process of  
23 subpoenaing member institutions that have yet to provide information;

24 WHEREAS, the parties are concerned that some member institutions' responses to the  
25 subpoenas (which will yield additional information regarding the names and last-known addresses  
26 of NCAA football and basketball players who were listed on a roster published or issued by a  
27 school whose team was included in an NCAA-Branded Videogame originally published or  
28

distributed during the respective class periods) will not be received until after January 2, 2015, the current date for mailed notice to issue under both orders (Case No. 09-1967-CW, Dkt. No. 1178, at 4; Case No. 09-1967-CW, Dkt. No. 1177, at 6);

WHEREAS, all parties agree that an extension of sixty days will benefit class members by allowing the parties to obtain additional contact information for class members, and that the extension will likely result in a higher claim rate.

**IT IS HEREBY STIPULATED AND AGREED THAT:**

The following deadlines in both preliminary-approval orders (Case No. 09-1967-CW, Dkt. Nos. 1177, 1178) are extended as set forth below:

Event	Current Deadline (Dkt. Nos. 1177, 1178)	New Deadline
Mailed Notice Date	January 2, 2015	March 3, 2015
Plaintiffs' Fee Petitions	February 10, 2015	April 13, 2015
Opt-Out/Objection Deadline	March 3, 2015	May 4, 2015
Replies to Objections	April 30, 2015	July 2, 2015
Claims Deadline	April 30, 2015	July 2, 2015
Fairness Hearing	May 14, 2015 at 2 p.m.	July 16, 2015 at 2 p.m.

The authority for and concurrence in the filing of this stipulated request has been obtained from each of the signatories, pursuant to Civil Local Rule 5-1(i)(3).

Dated: December 26, 2014

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1 Dated: December 26, 2014

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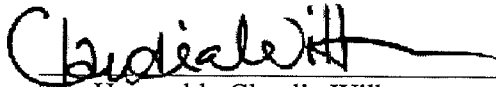
21 rwierenga@schiffhardin.com

22 Attorneys for Defendant National Collegiate  
23 Athletic Association

**ORDER**

Pursuant to the stipulation of counsel, IT IS SO ORDERED.

Dated: December 29, 2014

  
The Honorable Claudia Wilken  
Chief United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on December 26, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification to the e-mail addresses registered.

/s/ Leonard W. Aragon  
LEONARD W. ARAGON

# **EXHIBIT - 2**



**Upload Statistics Report**  
**NCAA/EA Likeness Settlement Census**  
 February 23, 2015

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 Swathi Bojedla  
 Hausfeld

Renae Steiner  
 Heins Mills & Olson PLC

School	Team Name	Upload Date	2nd Upload
Rider University	Rider Broncos	11/17/2014	
Marquette University	Marquette Golden Eagles	11/19/2014	
University of Kentucky	Kentucky Wildcats	11/21/2014	
Monmouth University	Monmouth Hawks	11/26/2014	
Manhattan College	Manhattan Jaspers	12/3/2014	
College of the Holy Cross	Holy Cross Crusaders	12/3/2014	
University of Evansville	Evansville Purple Aces	12/4/2014	
St. John's University (New York)	St. John's Red Storm	12/4/2014	
Indiana University-Purdue University, Fo	IPFW Mastadons	12/4/2014	
South Dakota State University	South Dakota State Jackrabbits	12/4/2014	
Youngstown State University	Youngstown State Penguins	12/5/2014	
North Dakota State University	North Dakota State Bison	12/5/2014	
Arizona State University	Arizona State Sun Devils	12/5/2014	
Villanova University	Villanova Wildcats	12/6/2014	
Louisiana State University	LSU Tigers	12/6/2014	
Niagara University	Niagara University Purple Eagles	12/6/2014	
Wofford College	Wofford Terriers	12/8/2014	
Elon University	Elon Phoenix	12/8/2014	
University of Vermont	Vermont Catamounts	12/8/2014	
Gonzaga University	Gonzaga Bulldogs	12/8/2014	
St. Bonaventure University	St. Bonaventure Bonnies	12/8/2014	
University of North Carolina, Charlotte	Charlotte 49ers	12/8/2014	
Campbell University	Campbell Fighting Camels	12/8/2014	
Auburn University	Auburn Tigers	12/8/2014	
Drake University	Drake Bulldogs	12/8/2014	
Missouri State University	Southwest Missouri State Bears	12/9/2014	
Siena College	Siena Saints	12/9/2014	
University of Wisconsin, Madison	Wisconsin Badgers	12/9/2014	
Stetson University	Stetson Hatters	12/9/2014	
University of Wisconsin-Green Bay	#N/A	12/9/2014	
Texas Southern University	Texas Southern Tigers	12/9/2014	
New Mexico State University	New Mexico State Aggies	12/9/2014	
University of Texas at Arlington	UT Arlington Mavericks	12/9/2014	
Montana State University-Bozeman	Montana State Bobcats	12/9/2014	
University of San Diego	San Diego Toreros	12/9/2014	
Saint Francis University (Pennsylvania)	Saint Francis Red Flash	12/10/2014	
Morehead State University	Morehead State Eagles	12/10/2014	
University of New Mexico	New Mexico Lobos	12/10/2014	
University of Georgia	Georgia Bulldogs	12/10/2014	
University of Wyoming	Wyoming Cowboys	12/10/2014	
DePaul University	DePaul Blue Demons	12/10/2014	
Georgia Institute of Technology	Georgia Tech Yellow Jackets	12/10/2014	
University of Washington	Washington Huskies	12/10/2014	
Belmont University	Belmont Bruins	12/10/2014	
Illinois State University	Illinois State Redbirds	12/10/2014	
University of New Orleans	New Orleans Privateers	12/10/2014	
University of Miami (Florida)	Miami Hurricanes	12/10/2014	
University of Hawaii, Manoa	Hawaii Rainbow Warriors	12/10/2014	
Stephen F. Austin State University	Stephen F. Austin Lumberjacks	12/10/2014	
University of Tennessee at Chattanooga	Tennessee-Chattanooga Mocs	12/10/2014	
University of Wisconsin, Milwaukee	UW-Milwaukee Panthers	12/10/2014	
Lipscomb University	Lipscomb Bison	12/10/2014	
Yale University	Yale Bulldogs	12/10/2014	
Bowling Green State University	Bowling Green Falcons	12/10/2014	
University of North Florida	North Florida Ospreys	12/10/2014	
Valparaiso University	Valparaiso Crusaders	12/10/2014	
University of Montana	Montana Grizzlies	12/10/2014	
Pennsylvania State University	Pennsylvania State Nittany Lions	12/10/2014	
East Carolina University	East Carolina Pirates	12/10/2014	
Texas A&M University-Corpus Christi	A&M Corpus Christi Islanders	12/10/2014	
Wichita State University	Wichita State Shockers	12/10/2014	
The Citadel	The Citadel Bulldogs	12/10/2014	
University of Iowa	Iowa Hawkeyes	12/10/2014	
University of Maryland, College Park	Maryland Terrapins	12/10/2014	
University of North Carolina, Chapel Hill	North Carolina Tar Heels	12/10/2014	
University of Portland	Portland Pilots	12/10/2014	
Northern Arizona University	Northern Arizona Lumberjacks	12/10/2014	
University of Hartford	Hartford Hawks	12/10/2014	
Vanderbilt University	Vanderbilt Commodores	12/10/2014	
University of South Alabama	South Alabama Jaguars	12/10/2014	
Northwestern University	Northwestern Wildcats	12/10/2014	
University of California, Irvine	UC Irvine Anteaters	12/10/2014	
Mississippi State University	Mississippi State Bulldogs	12/10/2014	
American University	American Eagles	12/11/2014	
Middle Tennessee State University	Middle Tennessee State Blue Raiders	12/11/2014	
Dartmouth College	Dartmouth Big Green	12/11/2014	
University of Dayton	Dayton Flyers	12/11/2014	
Loyola University Chicago	Loyola College	12/11/2014	
Bucknell University	Bucknell Bison	12/11/2014	
University of Delaware	Delaware Blue Hens	12/11/2014	
Idaho State University	Idaho State Bengals	12/11/2014	
University of Virginia	Virginia Cavaliers	12/12/2014	
George Washington University	George Washington Colonials	12/12/2014	
University of Missouri, Columbia	Missouri Tigers	12/12/2014	



School	Team Name	Upload Date	2nd Upload
St. Francis College Brooklyn	St. Francis College Terriers	12/12/2014	
Iowa State University	Iowa State Cyclones	12/12/2014	
Davidson College	Davidson Wildcats	12/12/2014	
Kent State University	Kent State Golden Flashes	12/12/2014	
Boise State University	Boise State Broncos	12/12/2014	
Quinnipiac University	Quinnipiac Bobcats	12/12/2014	
Arkansas State University	Arkansas State Red Wolves	12/12/2014	
University of Texas at El Paso	UTEP Miners	12/12/2014	
Seton Hall University	Seton Hall Pirates	12/12/2014	
University of Alabama	Alabama Crimson Tide	12/12/2014	
University of Southern California	USC Trojans	12/12/2014	
University of Illinois, Champaign	Illinois Fighting Illini	12/13/2014	
Georgetown University	Georgetown Hoyas	12/15/2014	
West Virginia University	West Virginia Mountaineers	12/15/2014	
University of Northern Iowa	UNI Panthers	12/15/2014	
Xavier University	Xavier Musketeers	12/15/2014	
University of Louisiana at Monroe	UL Monroe Warhawks	12/15/2014	
Eastern Washington University	Eastern Washington Eagles	12/15/2014	
University of Northern Colorado	Northern Colorado Bears	12/15/2014	
Louisiana Tech University	Louisiana Tech Bulldogs	12/16/2014	
University of Akron	Akron Zips	12/16/2014	
Colorado State University	Colorado State Rams	12/16/2014	
Saint Louis University	Saint Louis Billikens	12/16/2014	
University of Pittsburgh	Pittsburgh Panthers	12/16/2014	
McNeese State University	McNeese State Cowboys	12/16/2014	
Tennessee Technological University	Tennessee Tech Golden Eagles	12/16/2014	
Santa Clara University	Santa Clara Broncos	12/16/2014	
University of Utah	Utah Utes	12/16/2014	
Southeastern Louisiana University	Southeastern Louisiana Lions	12/16/2014	
Fairleigh Dickinson University, Metropolitan Campus	Fairleigh Dickinson Knights	12/17/2014	
University of Mississippi	Ole Miss Rebels	12/17/2014	
Austin Peay State University	Austin Peay Governors	12/17/2014	
University of Massachusetts, Amherst	Umass Minutemen	12/17/2014	
Ball State University	Ball State Cardinals	12/17/2014	
University at Buffalo, the State University of New York	Buffalo Bulls	12/17/2014	
University of New Hampshire	New Hampshire Wildcats	12/17/2014	
Eastern Illinois University	Eastern Illinois Panthers	12/18/2014	
Western Carolina University	Western Carolina Catamounts	12/18/2014	
Virginia Commonwealth University	VCU Rams	12/18/2014	
Butler University	Butler Bulldogs	12/18/2014	
Oklahoma State University	Oklahoma State Cowboys	12/18/2014	
University of Richmond	Richmond Spiders	12/18/2014	
University of Tennessee at Martin	Tennessee-Martin Skyhawks	12/18/2014	
Kennesaw State University	Kennesaw State Owls	12/18/2014	
Bradley University	Bradley Braves	12/18/2014	
Mercer University	Mercer Bears	12/18/2014	
University of Tennessee, Knoxville	Tennessee Volunteers	12/19/2014	
Duke University	Duke Blue Devils	12/19/2014	
Texas Christian University	TCU Horned Frogs	12/19/2014	
Marshall University	Marshall Thundering Herd	12/19/2014	
Western Illinois University	Western Illinois Leathernecks	12/19/2014	
Miami University (Ohio)	Miami (OH) Redhawks	12/19/2014	
University of Texas at San Antonio	UTSA Roadrunners	12/19/2014	
Brigham Young University	Brigham Young Cougars	12/19/2014	
North Carolina State University	NC State Wolfpack	12/19/2014	
Eastern Michigan University	Eastern Michigan Eagles	12/19/2014	
Northwestern State University	Northwestern State Demons	12/19/2014	
Florida International University	Florida International (FIU) Golden Panthers	12/19/2014	
Delaware State University	Delaware State Hornets	12/19/2014	
College of Charleston (South Carolina)	College of Charleston Cougars	12/22/2014	
Wake Forest University	Wake Forest Demon Deacons	12/22/2014	
Southeast Missouri State University	Southeast Missouri State Indians	12/22/2014	
La Salle University	La Salle Explorers	12/22/2014	
Oregon State University	Oregon State Beavers	12/22/2014	
Canisius College	Canisius Golden Griffins	12/22/2014	
University of Nevada, Las Vegas	UNLV Rebels	12/22/2014	
Lafayette College	Lafayette Leopards	12/22/2014	
Georgia Southern University	Georgia Southern Eagles	12/22/2014	
Purdue University	Purdue Boilermakers	12/23/2014	
Southern Illinois University at Carbondale	Southern Illinois Salukis	12/23/2014	
Duquesne University	Duquesne Dukes	12/23/2014	
The Ohio State University	Ohio State Buckeyes	12/23/2014	
Marist College	Marist Red Foxes	12/24/2014	
Rice University	Rice Owls	12/23/2014	
Creighton University	Creighton Bluejays	12/18/2014	
University of Louisiana at Lafayette	UL Lafayette Ragin' Cajuns	12/15/2014	
University of California, Davis	UC Davis Aggies	12/28/2014	
University of Missouri-Kansas City	UMKC Kangaroos	12/30/2014	
University of Connecticut	Connecticut Huskies	12/30/2014	
Columbia University-Barnard College	Columbia	12/30/2014	
Georgia State University	Georgia State Panthers	12/31/2014	
University of California, Los Angeles	UCLA Bruins	12/31/2014	
University of South Florida	South Florida Bulls	1/2/2015	
Stanford University	Stanford Cardinal	1/4/2015	
University of Louisville	Louisville Cardinals	1/5/2015	
Robert Morris University	Robert Morris Colonials	1/5/2015	
Boston College	Boston College Eagles	1/5/2015	
California State University, Northridge	Cal State Northridge Matadors	1/5/2015	
University of Colorado, Boulder	Colorado Buffaloes	1/5/2015	
University of South Carolina, Columbia	South Carolina Gamecocks	1/5/2015	
University of Oklahoma	Oklahoma Sooners	1/6/2015	
Cleveland State University	Cleveland State Vikings	1/7/2015	
University of Kansas	Kansas Jayhawks	1/7/2015	
University of Florida	Florida Gators	1/7/2015	
Boston University	Boston University Terriers	12/18/2014	
North Carolina A&T State University	North Carolina A&T Aggies	1/7/2015	
Pepperdine University	Pepperdine Waves	1/7/2015	
St. Mary's College of California	Saint Mary's Gaels	1/7/2015	
University of Texas at Austin	Texas Longhorns	1/7/2015	
Nicholls State University	Nicholls Colonels	1/8/2015	
Winthrop University	Winthrop Eagles	1/8/2015	
Portland State University	Portland State Vikings	1/8/2015	
Kansas State University	Kansas State Wildcats	1/8/2015	

School	Team Name	Upload Date	2nd Upload
Oral Roberts University	Oral Roberts Golden Eagles	1/8/2015	
Old Dominion University	Old Dominion Monarchs	1/8/2015	
Radford University	Radford Highlanders	1/9/2015	
Long Island University-Brooklyn Campus	Long Island Blackbirds	1/9/2015	
Binghamton University	Binghamton Bearcats	1/9/2015	
University of North Carolina Asheville	UNC Asheville Bulldogs	1/9/2015	
East Tennessee State University	East Tennessee State Buccaneers	1/9/2015	
California State University, Fullerton	Cal State Fullerton Titans	1/9/2015	
Northeastern University	Northeastern Huskies	1/12/2015	
Texas A&M University, College Station	Texas A&M Aggies	1/12/2015	
The University of Tulsa	Tulsa Golden Hurricanes	1/12/2015	
Lehigh University	Lehigh Mountain Hawks	1/12/2015	
Utah State University	Utah State Aggies	1/12/2015	
Washington State University	Washington State Cougars	1/12/2015	
Sacred Heart University	Sacred Heart Pioneers	1/12/2015	
Fairfield University	Fairfield Stags	1/12/2015	
Western Michigan University	Western Michigan Broncos	1/12/2015	
University of Detroit Mercy	Detroit Titans	1/12/2015	
Wagner College	Wagner Seahawks	1/12/2015	
Mount St. Mary's University	Mount St. Mary's Mountaineers	1/13/2015	
University of North Texas	North Texas Mean Green	1/13/2015	
San Jose State University	San Jose State Spartans	1/13/2015	
Princeton University	Princeton Tigers	1/13/2015	
Chicago State University	Chicago State Cougars	1/13/2015	
University of Denver	Denver Pioneers	1/13/2015	
Central Connecticut State University	Central Connecticut Blue Devils	1/13/2015	
Ohio University	Ohio Bobcats	1/14/2015	
University of Memphis	Memphis Tigers	1/14/2015	
Southern Utah University	Southern Utah Thunderbirds	1/14/2015	
Texas Tech University	Texas Tech Red Raiders	1/15/2015	
Stony Brook University	Stony Brook Sea Wolves	1/15/2015	
Indiana State University	Indiana State Sycamores	1/16/2015	
High Point University	High Point Panthers	1/16/2015	
Troy University	Troy Trojans	1/16/2015	
University of Idaho	Idaho Vandals	1/19/2015	
Virginia Military Institute	VMI Keydets	1/21/2015	
Iona College	Iona Gaels	1/21/2015	
Texas A&M University-Corpus Christi	A&M Corpus Christi Islanders	1/20/2015	Y
California State University, Sacramento	Sacramento State Hornets	1/22/2015	
Duquesne University	Duquesne Dukes	1/23/2015	Y
University of Nebraska, Lincoln	Nebraska Cornhuskers	1/24/2015	
University of Memphis	Memphis Tigers	1/26/2015	Y
Loyola Marymount University	Loyola Marymount Lions	1/26/2015	
University of Arkansas, Little Rock	Arkansas-Little Rock Trojans	1/28/2015	
Mississippi Valley State University	Mississippi Valley State Delta Devils	1/27/2015	
University of Houston	Houston Cougars	1/28/2015	
Fairfield University	Fairfield Stags	1/28/2015	Y
University of North Carolina Wilmington	UNCW Seahawks	1/28/2015	
Hofstra University	Hofstra Flying Dutchman	1/29/2015	
Tennessee State University	Tennessee State Tigers	1/29/2015	
Lamar University	Lamar Cardinals	1/30/2015	
Loyola University Maryland	Loyola University MD Greyhounds	2/2/2015	
Florida Atlantic University	Florida Atlantic Owls	2/2/2015	
Coastal Carolina University	Coastal Carolina Chanticleers	2/2/2015	
Clemson University	Clemson Tigers	2/2/2015	
Indiana University-Purdue University at Indianapolis	IUPUI Jaguars	2/3/2015	
Grambling State University	Grambling State Tigers	2/3/2015	
Brown University	Brown Bears	2/3/2015	
Southern Methodist University	SMU Mustangs	2/4/2015	
Canisius College	Canisius Golden Griffins	2/4/2015	Y
University of Oregon	Oregon Ducks	2/4/2015	
University of California, Santa Barbara	UCSB Gauchos	2/5/2015	
Drexel University	Drexel Dragons	2/5/2015	
Texas Christian University	TCU Horned Frogs	2/5/2015	Y
Weber State University	Weber State Wildcats	2/5/2015	
Florida State University	Florida State Seminoles	2/5/2015	
University of Minnesota, Twin Cities	Minnesota Golden Gophers	2/6/2015	
Southern Utah University	Southern Utah Thunderbirds	2/6/2015	Y
Bethune-Cookman University	Bethune-Cookman Wildcats	2/6/2015	
University of Cincinnati	Cincinnati Bearcats	2/6/2015	
George Mason University	George Mason Patriots	2/9/2015	
Michigan State University	Michigan State Spartans	2/10/2015	
University of Central Florida	UCF Golden Knights	2/10/2015	
Liberty University	Liberty Flames	2/10/2015	
Bradley University	Bradley Braves	2/10/2015	Y
Wright State University	Wright State Rowdy Raider	2/11/2015	
University of California, Los Angeles	UCLA Bruins	2/11/2015	Y
Temple University	Temple Owls	2/11/2015	
Rutgers, The State University of New Jersey, New Brunswick	Rutgers Scarlet Knights	2/11/2015	
Bradley University	Bradley Braves	2/11/2015	Y
University of Wisconsin, Milwaukee	UW-Milwaukee Panthers	2/12/2015	Y
James Madison University	James Madison Dukes	2/12/2015	
Sam Houston State University	Sam Houston State Bearcats	2/12/2015	
Eastern Kentucky University	Eastern Kentucky Colonels	12/10/2014	
College of William and Mary	William & Mary Tribe	2/13/2015	
Long Beach State University	Long Beach State 49ers	2/13/2015	
California State University, Fresno	Fresno State Bulldogs	2/13/2015	
Oakland University	Oakland Golden Grizzlies	2/13/2015	
Bradley University	Bradley Braves	2/13/2015	Y
Cornell University	Cornell Big Red	2/13/2015	
University of Oregon	Oregon Ducks	2/14/2015	Y
Indiana University, Bloomington	Indiana Hoosiers	2/16/2015	
Gardner-Webb University	Gardner Webb Runnin' Bulldogs	2/16/2015	
Central Connecticut State University	Central Connecticut Blue Devils	2/17/2015	Y
University of Massachusetts, Amherst	Umass Minutemen	2/17/2015	Y
Virginia Polytechnic Institute and State University	Virginia Tech Hokies	2/17/2015	
Birmingham-Southern College	Birmingham-Southern College Panthers	2/17/2015	
University of California, Santa Barbara	UCSB Gauchos	2/18/2015	1
University of California, Berkeley	California Golden Bears	2/19/2015	
University of California, Irvine	UC Irvine Anteaters	2/19/2015	1
Furman University	Furman Paladins	2/19/2015	

School	Team Name	Upload Date	2nd Upload
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Visitors to Download Page: 496  
Total Upload Count: 288  
Unique School Count: 273

# **EXHIBIT - 3**

# NCAA Schools Responding to Census

Requests were sent to 330 NCAA schools. As of 2/23/15, responses have been received from 273 unique schools.  
*Please note that some schools have responded with more than one upload. This chart represents uploads by day.*

